A. T. P. COMPANY, a general partnership of Frederick County, State of Maryland, FRED B. ABELES, General Partner, 2104 Runny Court, Clover Hill, Frederick, Maryland 21701

Complainant

CIRCUIT COURT

BROWN 169 W. All Saints Street Frederick, Maryland 21701

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OF MARYLAND

IN THE

and

HELENA L. BROWN 169 W. All Saints Street Frederick, Maryland 21701

FOR

\*

and

FREDERICK COUNTY \*

LEE VIRGINIA SEWELL 302 Broadway Street Frederick, Maryland 21701

and

CHARLOTTE W. YARROLL Treasurer of Frederick County Winchester Hall Frederick, Maryland 21701

and

All persons having or claiming to have any interest in the property, being lot 60 by 175 \* feet, north-side of Main Street, New Market, New Market Election District, Frederick County, Maryland

Respondents

## BILL OF COMPLAINT

Fred B. Abeles, General Partner of A.T.P. Company, a general partnership of Frederick County, Maryland, by F. Theodore Elliot, III and Zimmerman, Aldridge & Dwyer, his solicitors, alleges:

1. That Certificate of Sale No. 519, attached hereto as "Exhibit A" and hereby made a part of this Bill, was issued by the Collector of Taxes for Frederick County, State of Maryland, on November 24, 1975.

ZIMMERMAN, ALDRIDGE A DWAEL ATTORNEYS AT LAW 120 WEST CHURCH STREET FREDERICK, MARYLAND 21701

(301) 663-5191